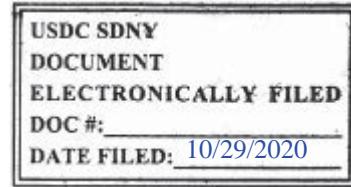# BURSOR & FISHER
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October 27, 2020

Via ECF

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The Honorable Alison J. Nathan
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 906
New York, New York 10007

Re: *Chamlin v. Johnson & Johnson, et al.*, Case No. 1:19-cv-03852-AJN (S.D.N.Y. 2019)

Dear Judge Nathan:

Pursuant to Your Honor's Individual Practices, Plaintiff Matthew Chamlin and Defendants McNeil Nutritionals, LLC and Johnson & Johnson hereby jointly request a stay of all proceedings to allow the parties to pursue settlement of this action during an upcoming mediation.

Over the past several weeks, counsel for both parties have engaged in settlement discussions that recently resulted in an agreement to pursue settlement through mediation. The parties have selected a mediator and are in the process of scheduling the mediation in November or early December. Therefore, the parties request a stay of all proceedings and deadlines to allow them to focus solely on resolution leading up to the mediation. The parties propose to update the Court in writing on or before December 11, 2020 about the status of their settlement efforts.

Respectfully submitted,

O'MELVENY & MYERS LLP   BURSOR & FISHER, P.A.

/s/ *Hannah Y. Chanoine*   /s/ *Joseph I. Marchese*

Hannah Y. Chanoine   Joseph I. Marchese

CC: All counsel of record (via ECF)

The parties' request for a stay is hereby GRANTED. All conferences and deadlines are adjourned *sine die*. In light of the stay, the Court administratively denies Defendants' motion to dismiss, Dkt. No. 17; Plaintiff's class certification motion and motion to seal, Dkt. No. 60, 66; and Defendants' motion to exclude testimony of Plaintiff's experts and motion to seal, Dkt. No. 76, 78, with leave to refile if settlement is unsuccessful. The parties shall file a status update by December 11, 2020. This resolves Docket Numbers 17, 60, 66, 76, and 78.
SO ORDERED.   10/28/2020